

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b>
<b>MATTHEW SANDERS</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1951 (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c) (using and carrying a</b>
	<b>:</b>	<b>firearm during a crime of violence - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The K-Mart store located at 900 Orthodox Street in Philadelphia, Pennsylvania is a retail business that sells consumer goods and which is engaged in interstate commerce.

2. On or about December 30, 2006, in the Eastern District of Pennsylvania, defendant

**MATTHEW SANDERS**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that he unlawfully took and obtained money from K-Mart, in the presence of D.B., an employee of K-Mart, and against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to D.B., an employee of K-Mart, that is, by pointing a firearm at, handcuffing, and otherwise threatening D.B..

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 30, 2006, in the Eastern District of Pennsylvania,  
defendant

**MATTHEW SANDERS**

knowingly used and carried a firearm during and in relation to a crime of violence for which he  
may be prosecuted in a Court of the United States, that is, interference with commerce by  
robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Section 924(c)(1).

### **NOTICE OF FORFEITURE**

1. As a result of the violation of Title 18, United States Code, Section 1951(a), set forth in this indictment, defendant

#### **MATTHEW SANDERS**

shall forfeit to the United States of America, any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense, as charged in this indictment, including, but not limited to approximately \$28,000 in robbery proceeds.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**